

**CHAITMAN LLP**

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*Attorneys for Defendants*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro No. 10-04889 (CGM)

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC,

Plaintiff,

v.

THE ESTATE OF ROBERT SHERVYN SAVIN, and  
BARBARA L. SAVIN, in her capacity as Personal  
Representative of the Estate of Robert Shervyn Savin,

Defendants.

**DECLARATION OF HELEN DAVIS CHAITMAN IN OPPOSITION TO THE  
TRUSTEE'S MOTION FOR SUMMARY JUDGMENT**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C.

§1746, as follows:

1. I am a member of Chaitman LLP, attorney for Defendants the Estate Of Robert Shervyn Savin, and Barbara L. Savin, in her capacity as Personal Representative of the Estate of Robert Shervyn Savin (together “Defendants”). I am a member of the bars of New York and New Jersey, and I am admitted to practice in this Court.

2. Barbara L. Savin has been sued only in her capacity as “Personal Representative of the Estate of Robert Shervyn Savin.”

3. Hence, any judgment entered by this Court is limited to a judgment against Ms. Savin as “Personal Representative of the Estate of Robert Shervyn Savin.” The Trustee has never sued Ms. Savin in her individual capacity.

Dated: July 27, 2022  
New York, New York

**CHAITMAN LLP**  
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